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UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA	
JOSHUA RICE <div style="text-align: center;">PLAINTIFF(S)</div> <div style="text-align: center;">V.</div> CITY OF BELL GARDENS, <div style="text-align: center;">DEFENDANT(S).</div>	CASE NUMBER CV09- 9432 SJO (RCx) ADR PILOT PROGRAM QUESTIONNAIRE

(1) What, if any, discovery do the parties believe is essential in order to prepare adequately for a settlement conference or mediation? Please outline with specificity the type(s) of discovery and proposed completion date(s). Please outline any areas of disagreement in this regard. Your designations do not limit the discovery that you will be able to take in the event this case does not settle.

The parties believe the following discovery is necessary:
depositions of Plaintiffs, the involved officers and any witnesses;
production of documents including officer personnel files,
City policies, investigation/use of force reports and any recorded
statements of officers and witnesses.

(2) What are the damage amounts being claimed by each plaintiff? Identify the categories of damage claimed (e.g., lost profits, medical expenses (past and future), lost wages (past and future), emotional distress, damage to reputation, etc.) and the portion of the total damages claimed attributed to each category.

Plaintiff Joshua Rice claims compensatory damages, punitive
damages, medical expenses, emotional distress and lost wages.
Plaintiff will be better suited to determine the approximate
amount of each category of damages after some discovery.

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(3) Do the parties agree to utilize a private mediator in lieu of the court's ADR Pilot Program?

Yes ☒ No ☐

(4) If this case is in category civil rights - employment (442), check all boxes that describe the legal bases of plaintiff claim(s).

☐ Title VII

☐ Age Discrimination

☐ 42 U.S.C. section 1983

☐ California Fair Employment and Housing Act

☐ Americans with Disabilities Act of 1990

☐ Rehabilitation Act

☐ Other _____

I hereby certify that all parties have discussed and agree that the above-mentioned responses are true and correct.

April 29, 2010

Date

Melanie J. Peton

Attorney for Plaintiff (Signature)

Melanie T. Partow

Attorney for Plaintiff (Please print full name)

April 12/10

Date

Glen E. Tucker

Attorney for Defendant (Signature)

Glen E. Tucker

Attorney for Defendant (Please print full name)